

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

NORTHSIDE CHURCH OF CHRIST,

Plaintiff,

v.

OHIO SECURITY INSURANCE CO.,

Defendant.

Case No. 3:20-cv-00184

Chief Judge Waverly D. Crenshaw, Jr

Magistrate Judge Jeffery S. Frensley

**DEFENDANT OHIO SECURITY INSURANCE COMPANY'S
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR
LACK OF PERSONAL JURISDICTION OVER CLAIMS ALLEGED
ON BEHALF OF NONRESIDENT PUTATIVE CLASS MEMBERS**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendant Ohio Security Insurance Company (“Ohio Security”) moves to dismiss Plaintiff’s claims against it asserted on behalf of non-Tennessee resident alleged class members. This Court lacks specific personal jurisdiction over Ohio Security to adjudicate claims of Ohio and Mississippi policyholders based on policies of insurance issued in, and property damage claims that occurred in, Ohio and Mississippi. Therefore, claims asserted on behalf of Ohio and Mississippi putative class members must be dismissed.

The grounds for granting this motion are more fully stated in the contemporaneously-filed Memorandum in Support, which is incorporated herein.

Respectfully submitted,

s/ Rand L. McClellan

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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2020, counsel for Defendant Ohio Security Insurance Co. electronically filed copies of the **Defendant's Motion to Dismiss Plaintiff's Amended Complaint for Lack of Personal Jurisdiction Over Claims Alleged on Behalf of Nonresident Putative Class Members** with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to all parties registered with the Court's electronic filing system.

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